1 THE HONORABLE JOHN C. COUGHENOUR 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 9 10 INNOVATIVE SOLUTIONS INTERNATIONAL, INC., a Washington Case No.: 2:22-cv-00296-JCC 11 corporation, STIPULATED MOTION AND 12 Plaintiff. [PROPOSED] ORDER RESETTING DEADLINES FOR 13 **POST-TRIAL BRIEFING** 14 HOULIHAN TRADING CO., INC., a Florida corporation; BRIGHTON GROUP. **NOTING DATE: DECEMBER 18,** 15 LLC, an Arkansas limited liability company; 2024 MARCUS TECHNOLOGIES LLC, a Texas 16 limited liability company; SHUMAKER INTERNATIONAL CORP., a Tennessee 17 corporation; COOK INTERNATIONAL TRADE & BROKERAGE, INC., a Florida 18 corporation; NORTH SOUTH FOODS GRP., INC., a Florida corporation; 19 HENLEY'S WHOLESALE MEATS, INC., an Arkansas corporation; PILGRIM'S 20 PRIDE CORP., a Delaware corporation; and DOES 1–10. 21 Defendants. 22 23 STIPULATION & RELIEF REQUESTED 24 Plaintiff Innovative Solutions International, Inc. ("Innovative"), defendant Houlihan 25 Trading Co., Inc. ("Houlihan"), and defendant Pilgrim's Pride Corp. ("Pilgrim's," and collectively, 26 STIPULATED MOTION AND [PROPOSED] ORDER RESETTING DEADLINES FOR POST TRIAL BRIEFING - 1 (2:22-cv-00296-JCC K&L GATES LLP 925 FOURTH AVENUE, SUITE 2900

SEATTLE, WASHINGTON 98104-1158 TELEPHONE: (206) 623-7580 FACSIMILE: (206) 623-7022

the "Parties") jointly submit the below proposed schedule for presentation of Houlihan's remaining cause of action for equitable relief, as well as opening briefing regarding certain post-trial motions.

1. Houlihan's cause of action for equitable remedies

	Houlihan's Brief	January 17, 2025		
Pilgrim's' Response		February 7, 2025		
	Houlihan's Reply/Presentment	February 28, 2025		

2. Innovative's Motion for Treble Damages under the Washington Consumer Protection Act

Innovative's Motion	Two Weeks from Entry of Judgment or
	January 17, 2025, whichever is later

3. Innovative's Motion for Attorneys' Fees and Costs under the Washington Consumer Protection Act (and/or costs pursuant to LCR 54(d))

Innovative's Motion	Two Weeks from Entry of Judgment or
	January 17, 2025, whichever is later

4. Houlihan's Motion for Costs pursuant to LCR 54(d)

Houlihan's Motion	Two Weeks from Entry of Judgment or
	January 17, 2025, whichever is later

## **PROPOSED** ORDER

The Court, having considered the foregoing Stipulation, and good cause appearing, orders as follows:

The Parties shall submit post-trial motions and briefing no later than the following dates:

1. Houlihan's cause of action for equitable remedies

Houlihan's Brief	January 17, 2025		
Pilgrim's' Response	February 7, 2025		
Houlihan's Reply/Presentment	February 28, 2025		

STIPULATED MOTION AND <del>[PROPOSED]</del> ORDER RESETTING DEADLINES FOR POST TRIAL BRIEFING - 2 (2:22-cv-00296-JCC

2.	Innovative's	Motion	for	Treble	Damages	under	the	Washington	Consumer
	Protection Ac	et							
	Innovative's	s Motion			T	wo Weel	ks fro	om Entry of Ju	dgment or

3. Innovative's Motion for Attorneys' Fees and Costs under the Washington Consumer Protection Act (and/or costs pursuant to LCR 54(d))

Innovative's Motion	Two Weeks from Entry of Judgment or		
	January 17, 2025, whichever is later		

4. Houlihan's Motion for Costs pursuant to LCR 54(d)

Houlihan's Motion	Two Weeks from Entry of Judgment or
	January 17, 2025, whichever is later

## IT IS SO ORDERED.

DATED: December 18, 2024.

John C Coyler and

January 17, 2025, whichever is later

Hon. John C. Coughenour United States District Court Judge

1	DATED December 18, 2024.	Respectfully submitted,
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3		
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25		Attorneys for Defendant Houlihan Trading Co., Inc.

STIPULATED MOTION AND [PROPOSED] ORDER RESETTING DEADLINES FOR POST TRIAL BRIEFING - 4 (2:22-cv-00296-JCC

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STIPULATED MOTION AND <del>[PROPOSED]</del> ORDER RESETTING DEADLINES FOR POST TRIAL BRIEFING - 5 (2:22-cv-00296-JCC

## **CERTIFICATE OF SERVICE**

2	I, Philip M. Guess, certify under penalty of	of perjury under the laws of the State of		
Washington that on December 18, 2024, I caused to be served a true and correct				
4	foregoing document on:			
5	Bennett J. Hansen Daniel Rankin	☐ Via Email ☐ Via First Class Mail		
6	Preg O'Donnell & Gillett PLLC	☐ Via Hand Delivery		
7	401 Union Street, Suite 1900 Seattle, WA 98101	⊠ Via CM/ECF		
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9	Theo A. Lesczynski	□ Via Email		
10	Davis Wright Tremaine, LLP 920 Fifth Avenue, Suite 3300	☐ Via First Class Mail☐ Via Hand Delivery		
11	Seattle, WA 98104 Email: theolesczynski@dwt.com	⊠ Via CM/ECF		
12	Kevin Kuhlman, pro hac vice	□ Via Email		
13	Daniel Blegen, <i>pro hac vice</i> Sarah Hobbs, <i>pro hac vice</i>	☐ Via First Class Mail ☐ Via Hand Delivery		
14	Spencer Fane LLP 1000 Walnut Street, Suite 1400	⊠ Via CM/ECF		
15	Kansas City, MO 64106 Email: <u>kkuhlman@spencerfane.com</u>			
16	dblegen@spencerfane.com shobbs@spencerfane.com			
17				
18	DATED: December 18, 2024.			
19	<u>s/Philip</u> Philip N	M. Guess 1. Guess		
20	•			
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CERTIFICATE OF SERVICE - 1

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